

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	:	
SECURITIES INVESTOR PROTECTION	:	
CORPORATION,	:	
	:	No. 08-01789 (BRL)
Plaintiff-Applicant,	:	
	:	SIPA Liquidation
v.	:	
	:	(Substantively Consolidated)
BERNARD L. MADOFF INVESTMENT	:	
SECURITIES LLC,	:	
	:	
Defendant	:	
-----X	:	
In re:	:	
	:	
BERNARD L. MADOFF,	:	
	:	
Debtor.	:	
-----X	:	
IRVING PICARD, Trustee for the	:	
Liquidation of Bernard L. Madoff Investment	:	
Securities LLC,	:	
	:	
Plaintiff	:	Adv. Pro. No. 12-01209 (BRL)
	:	
v.	:	
	:	
BSI AG, individually and as	:	
successor-in-interest to	:	
BANCO DEL GOTTARDO,	:	
	:	
Defendant.	:	
-----X	:	

**DECLARATION OF CHARLES C. PLATT IN SUPPORT OF MOTION OF
DEFENDANT BSI AG TO WITHDRAW THE REFERENCE**

CHARLES C. PLATT, hereby declares, under the penalty of perjury, that the following
is true and correct:

1. I am a member of the Bar of this Court and of the law firm Wilmer Cutler Pickering Hale and Dorr LLP, counsel for the defendant BSI AG in the above-captioned action. I submit this declaration in support of BSI's motion for an order withdrawing the reference of this matter to the Bankruptcy Court for the Southern District of New York.

2. A true and correct copy of the Complaint in *Picard v. BSI AG SA.*, Adv. Pro. No. 12-01209 (BRL), is annexed hereto as Exhibit A.

3. BSI was not a party to the action *Picard v. Fairfield Sentry Ltd., et al.*, Adv. Pro. No. 09-01239 (BRL). Nor was BSI a party to the settlement agreement or the consent judgment that terminated that lawsuit.

Dated: April 17, 2012
New York, New York

/s/ Charles C.Platt

Charles C. Platt